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Regulatory Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**BAKER & HOSTETLER'S FIFTH
MONTHLY FEE STATEMENT OF
SERVICES RENDERED AND
EXPENSES INCURRED FOR THE
PERIOD FROM OCTOBER 1, 2023
THROUGH OCTOBER 31, 2023**

Hearing Date: N/A
Hearing Time: N/A

Baker & Hostetler ("B&H" or "Applicant"), regulatory counsel to Cash Cloud, Inc., dba Coin Cloud ("Debtor"), debtor and debtor in possession in the above-referenced chapter 11 bankruptcy case (the "Chapter 11 Case"), respectfully submits its Monthly Fee Statement for Services Rendered and Expenses Incurred for the Period from October 1, 2023 through October 31, 2023 (the "October Statement"), pursuant to the *Order Authorizing Retention and Employment of Baker & Hostetler LLP as Regulatory Counsel to Debtor* [ECF No. 525] (the "Retention Order") and the Court's *Order Granting Debtor's Motion Pursuant to 11 U.S.C. §§ 105(a) and 331, And Fed. R. Banker. P. 2016, Authorizing and Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [ECF No. 321] (the "Interim Compensation Procedures Order").

In support of the October Statement, B&H respectfully represents as follows:

1 **Background**

2 1. B&H was retained as regulatory counsel to the Debtor pursuant to the Retention Order,
3 dated and entered on May 5, 2023. On May 9, 2023, the Debtor paid B&H a retainer of \$50,000.00
4 (the “Retainer”) as authorized in the Retention Order. The Retainer was extinguished pursuant to the
5 B&H’s prior approved fee statements for April and May 2023 (ECF Docket Nos. 607 and 792,
6 respectively).

7 2. B&H has endeavored to monitor and coordinate with the Debtor’s counsel in this
8 Chapter 11 Case to ensure a clear delineation of each firm’s respective roles in connection with the
9 representation of the Debtor in this Chapter 11 Case and to prevent duplication of services. The
10 professional services performed and expenses incurred by B&H were actual and necessary to preserve
11 and protect the value of the Debtor’s assets and estate.

12 3. B&H submitted four prior applications for compensation in connection with its
13 representation of the Debtor.

14 4. The first application (the “April Statement”) was for the period of April 4, 2023
15 through April 30, 2023 (ECF Docket No. 607) (the “April Statement Period”). In the April Statement
16 B&H sought allowance and payment of interim compensation for fees in the amount of \$9,300.80,
17 representing 80% of the \$11,626.00 in fees incurred for services rendered during the April Statement
18 Period. There were no expenses incurred in the April Statement Period. The holdback under the
19 April Statement is \$2,325.20 (the “April Holdback”).

20 5. A Certificate of No Objection to the April Statement was filed with the Court on June
21 21, 2023 (ECF Docket No. 740).

22 6. B&H’s second application (the “May Statement”) was for the period of May 1, 2023
23 through May 31, 2023 (ECF Docket No. 321) (the “May Statement Period”). In the May Statement,
24 B&H sought allowance and payment of interim compensation for fees in the amount of \$130,329.20,
25 representing 80% of the \$162,911.50 in fees incurred for services rendered during the May Statement
26 Period, and expenses in the amount of \$511.68, representing 100% of the expenses incurred in
27 connection with services rendered during the Statement Period. The holdback under the May
28 Statement is \$32,582.30 (the “May Holdback”).

7. A Certificate of No Objection to the May Statement was filed with the Court on August 2, 2023 (ECF Docket No. 792).

8. B&H's third application (the "June Statement") was for the period of June 1, 2023 through June 30, 2023 (ECF Docket No. 321) (the "June Statement Period"). In the June Statement, B&H sought allowance and payment of interim compensation for fees in the amount of \$5,867.20, representing 80% of the \$7,334.00 in fees incurred for services rendered during the June Statement Period. There were no expenses incurred during the June Statement Period. The holdback under the June Statement is \$1,466.80 (the "June Holdback").

9. A Certificate of No Objection to the June Statement was filed with the Court on October 17, 2023 (ECF Docket No. 1391).

10. B&H's fourth application (the "July & August Statement") was for the combined period of July 1, 2023 through July 31, 2023 and August 1, 2023 through August 31, 2023 (ECF Docket No. 1245) (the "July/August Statement Period"). In the July/August Statement, B&H sought allowance and payment of interim compensation for fees:

a. for July 2023, in the amount of \$7,087.20, representing 80% of the \$8,859.00 in fees incurred for services rendered during the July Statement Period. There were no expenses incurred in the July Statement Period. The holdback under the July Statement was \$1,771.80 (the "July Holdback").

b. For August 2023, \$1,241.60, representing 80% of the \$1,552.00 in fees incurred for services rendered during the July Statement Period. There were no expenses incurred in the August Statement Period. The holdback under the August Statement was \$310.40 (the "August Holdback").

11. A Certificate of No Objection to the July/August Statement was filed with the Court on October 6, 2023 (ECF Docket No. 1354).

The October Statement

12. In the instant application, B&H seeks allowance and payment of interim compensation for fees in the amount of \$3,104.00, representing 80% of the \$3,880.00 in fees incurred for services

1 rendered during the October Statement Period. There were no expenses incurred during the October
 2 Statement Period. The holdback under the October Statement is \$776.00 (the “October Holdback”).

3 13. Attached hereto as Exhibit A is the name of each timekeeper who performed services
 4 in connection with the Chapter 11 Case and the regulatory matters during the October Statement
 5 Period, and the hourly rate for each such timekeeper.

6 14. Attached hereto as Exhibit B is a detailed schedule of time expended by the
 7 timekeepers who performed services during the October Statement Period.

8 15. On the same date the October Statement was filed, a copy of the October Statement
 9 was served via electronic mail/notice on the following parties (each a “Notice Party,” and collectively
 10 the “Notice Parties”):

- 11 a. Cash Cloud, Inc., c/o Ayala & Associates, 300 S. 4th Street, 16th Floor,
 12 Las Vegas, NV 89101 (Attn: Daniel Ayala; dayala@ayalalaw.com);
- 13 b. Fox Rothschild, LLP, 1980 Festival Plaza Drive, Suite 700, Las
 14 Vegas, NV 89135 (Attn: Brett A. Axelrod, Esq.;
 baxelrod@foxrothschild.com); counsel to Debtor;
- 15 c. United States Trustee Tracy Hope Davis, 300 Las Vegas Boulevard
 16 South, Suite 4300, Las Vegas, NV 89101 (Attn: Jared A. Day, Trial
 Attorney; Jared.A.Day@usdoj.gov);
- 17 d. Seward & Kissell, LLP, One Battery Park Plaza, New York, NY
 18 10004 (Attn: Robert J. Gayda; gayda@sewkis.com; Catherine V.
 19 LoTempio; lotempio@sewkis.com; Andrew J. Matott;
 20 matott@sewkis.com), and McDonald Carano, LLP, 2300 West Sahara
 Avenue, Suite 1200, Las Vegas, NV 89102 (Attn: Ryan J. Works;
 21 rworks@mcdonaldcarano.com), counsel to the Official Committee of
 Unsecured Creditors;
- 22 e. Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL
 23 33131 (Attn: Jordi Gusó; JGuso@bergersingerman.com), and
 24 Sylvester & Polednak, Ltd., 1731 Village Center Circle, Las Vegas,
 NV 89134 (Attn: Jeffrey R. Sylvester; Jeff@SylvesterPolednak.com);
 counsel to DIP lender CKDL Credit, LLC;
- 25 f. Morrison & Foerster LLP, 250 West 55th Street, New York, NY
 26 10019-9601 (Attn: Andrew Kissner; akissner@mofo.com; Gary Lee;
 27 glee@mofo.com), and Shea Larsen, 1731 Village Center Circle, Suite
 150, Las Vegas, NV 89134 (Attn: James Patrick Shea;

jshea@shea.law; Bart K. Larsen; blarsen@shea.law; Kyle M. Wyant; kwyant@shea.law); counsel to Enigma Securities Limited; and

- g. Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, NY 10006, (Attn: Sean A. O'Neal; soneal@cgsh.com; Jane VanLare; jvanlare@cgsh.com), and Snell & Wilmer L.L.P., 3883 Howard Hughes Parkway, Suite 1100, Las Vegas, NV 89135 (Attn: Robert R. Kinas; rkinas@swlaw.com); counsel to Genesis Global Holdco, LLC.

16. Pursuant to the Interim Compensation Procedures Order, each Notice Party will have twenty (20) days after service (or the next business day if the 20th day is not a business day) of a Monthly Fee Application (the "Objection Deadline"), to object to the requested fees and expenses in accordance with the procedures described in subparagraph (b) set forth on page three of the Interim Compensation Procedures Order.

17. If no objections are raised on or before the Objection Deadline, Applicant shall file a certificate of no objection with the Court, after which Debtor shall be authorized to pay to Applicant an amount equal to 80 percent of the fees and 100 percent of the expenses incurred during the period covered by Applicant's Monthly Fee Application (the "Aggregate Monthly Amount").

18. If an objection is properly filed before the Objection Deadline, Applicant shall file a certificate of no objection with the Court with respect to the fees and expenses, if any, that are not subject to objection (the "Undisputed Fees" and "Undisputed Expenses"), after which Debtor shall be authorized to pay to Applicant an amount equal to 80 percent of the Undisputed Fees and 100 percent of the Undisputed Expenses incurred during the period covered by Applicant's Monthly Fee Application (the "Aggregate Monthly Undisputed Amount").

19. Applicant acknowledges that the interim payment of compensation sought in the October Statement does not constitute a request for final allowance of such compensation and reimbursement of expenses.

20. Neither Applicant nor any member of B&H has any agreement or understanding of any kind to divide, pay over, or share with any other person, except as among the members of B&H, any portion of the fees or expenses to be awarded pursuant to this Statement.

Dated this 5th day of December 2023.

BAKER & HOSTETLER LLP

By: /s/Michael A. Sabella
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Michael A. Sabella
45 Rockefeller Plaza
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(212) 589-4200
msabella@bakerlaw.com
Regulatory Counsel for Debtor

Respectfully submitted by:

FOX ROTHSCHILD LLP

By: /s/Brett A. Axelrod
BRETT A. AXELROD, ESQ.
Nevada Bar No. 5859
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
Counsel for Debtor

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)

EXHIBIT A**Summary of B&H Professionals and Paraprofessionals****October 1, 2023 through October 31, 2023**

<u>Attorney</u>	<u>Hourly Rate</u>	<u>Application Hours</u>	<u>Total Fees</u>
Michael A. Sabella – Counsel	\$970.00	4.0	\$3,880.00
Subtotal		4.0	\$3,880.00

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EXHIBIT B
Detailed Schedule of Time Expended by Professionals and Paraprofessionals
and Detailed Schedule of Expenses Incurred

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)

BakerHostetler

Cash Cloud Inc.
D/B/A Coin Cloud
10190 Covington Cross Dr
Las Vegas, NV 89144

Invoice Date: 11/20/23
Invoice Number: 51216329
B&H File Number: 12918/128018/000001
Taxpayer ID Number: 34-0082025
Page 1

Regarding: Regulatory Compliance Services

For professional services rendered through October 31, 2023

BALANCE FOR THIS INVOICE DUE BY 12/20/23 \$ 3,880.00
All amounts are in United States Dollars

Remittance Copy

Please include this page with payment

Invoice No: 51216329

Firm Contact Information

Katie Young
(312) 416-6226
kyoung@bakerlaw.com

Please Remit To:
Baker & Hostetler LLP
P.O. Box 70189
Cleveland, OH 44190-0189

Reference Invoice No:
51216329

FOR WIRE/ACH REMITTANCES:
Baker & Hostetler LLP
KeyBank, N.A., Cleveland, OH
Account No:

Email the "Remittance Copy" to
bakerlockbox@bakerlaw.com

BakerHostetler

Cash Cloud Inc.
D/B/A Coin Cloud
10190 Covington Cross Dr
Las Vegas, NV 89144

Invoice Date: 11/20/23
Invoice Number: 51216329
B&H File Number: 12918/128018/000001
Taxpayer ID Number: 34-0082025
Page 2

Regarding: Regulatory Compliance Services

For professional services rendered through October 31, 2023

Fees \$ 3,880.00

BALANCE FOR THIS INVOICE DUE BY 12/20/23 IN USD \$ 3,880.00

Baker&Hostetler LLP

*Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington*

Regarding: Regulatory Compliance Services
Matter Number: 128018.000001

Name	Hours	Rate	Amount
Sabella, Michael A.	4.00	\$ 970.00	\$ 3,880.00
Total	4.00		\$ 3,880.00

Date	Name	Description	Hours	Amount
10/16/23	Sabella, Michael A.	Work on preparation of final fee application for matter.	1.40	1,358.00
10/30/23	Sabella, Michael A.	Work on final fee application for case.	1.40	1,358.00
10/31/23	Sabella, Michael A.	Work on final fee application for case.	1.20	1,164.00
	Total		4.00	3,880.00

Baker & Hostetler LLP

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC Wilmington